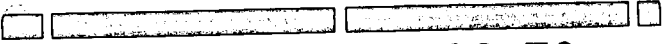


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**GROUNDWATER MONITORING INFORMATION
AND THE PART B PERMIT APPLICATION**

02/18/92

**DOE-726-92
DOE-FO/OEPA
2
LETTER**



Department of Energy
Fernald Environmental Management Project
P.O. Box 398705
Cincinnati, Ohio 45239-8705
(513) 738-6357

FEB 18 1992

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DOE-726-92

Mr. Paul Pardi, Group Leader
Solid and Hazardous Waste Management
Ohio Environmental Protection Agency
40 South Main Street
Dayton, Ohio 45402

GROUNDWATER MONITORING INFORMATION AND THE PART B PERMIT APPLICATION

Dear Mr. Pardi:

The Part B Permit Application for the Fernald Environmental Management Project (FEMP) was submitted to the Ohio Environmental Protection Agency (OEPA) in compliance with the proposed Amended Consent Decree. Groundwater monitoring for the land-based units is addressed under a separate cover entitled the "RCRA Groundwater Monitoring Plan," which was submitted to the OEPA on December 20, 1991, pursuant to compliance schedules submitted August 27, 1991.

This approach was developed based on several conversations with OEPA representatives. In telephone conversations with Ralph Slone, Rich Bendula, and Michael Eggert of OEPA on permit application requirements, the FEMP was advised that:

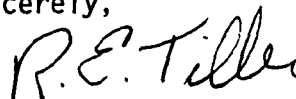
1. Only units for which the FEMP is seeking a permit should be addressed in the permit application.
2. To be permitted, land-based units must meet the minimum technological requirements for surface impoundments and the site suitability criteria in the Ohio Administrative Code 3745-28-07.
3. The site suitability criteria of OAC 3745-28-07 prevent the permitting of solid waste disposal facilities located over Sole Source Aquifers, and require 15 feet of geologically suitable material between the bottom of an impoundment and the uppermost Aquifer. The FEMP is located over the Great Miami Buried Valley Aquifer and the existing units are located in an area meeting current siting requirements for Hazardous Waste Management Units (HWMUs) identified in OAC 3745-28-07.

As a result of this information, Westinghouse Environmental Management Company of Ohio (WEMCO) determined that the units in question could not be permitted, and that the compliance schedules submitted in accordance with the proposed Amendments to the Consent Decree (PACD) could provide a mechanism for maintaining regulatory compliance with respect to the units. Therefore, the Groundwater Monitoring Plan was submitted under a separate cover, in accordance with the compliance schedules. The FEMP believes that the RCRA Groundwater Monitoring Program will meet the intent of the requirements of OAC 3745-65-90 through 3745-65-94.

Accompanying the compliance schedules for these units were justifications for delay. These units support the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) remedial efforts at the FEMP. The FEMP must operate the Wastewater Treatment System, including the Hazardous Waste Management Units (HWMUs) that are part of that system, for the treatment of non-hazardous process waters. This system is integral to the CERCLA response actions conducted by the FEMP. We request OEPA concurrence on Compliance Schedules to support continued Wastewater Treatment for FEMP cleanup.

If you or your staff have any questions, please contact David Rast at (513) 738-6322.

Sincerely,



R. E. Tiller
Manager

FO:Rast

cc:

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